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Citizens Environment Alliance of Southwestern Ontario  
David Suzuki Foundation  
Environmental Defence  
Environment Hamilton  
Midhurst Ratepayers' Association  
North Gwillimbury Forest Alliance  
Ontario Nature  
Sierra Club Ontario  
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By email: [PlacestoGrow@ontario.ca](mailto:PlacestoGrow@ontario.ca)  
Ministry of Infrastructure  
Ontario Growth Secretariat  
777 Bay Street, 4th Floor, Suite 425  
Toronto, ON M5G 2E5

Wednesday, April 30, 2014

**Re: Ministry of Infrastructure, Towards Performance Indicators for the Growth Plan for the Greater Golden Horseshoe, 2006, Preliminary Indicators for Discussion & Consultation – Consultation Submission.**

Thank you for the opportunity to comment on the Places to Grow preliminary indicators. This is an important moment in time to carefully think about and create indicators that truly assess the effectiveness of Ontario's Growth Plan with an eye towards improving the plan and achieving long term success for all Ontarians.

The following submission is being made collectively on behalf of the undersigned organizations. Our submission comes in response to the consultation being undertaken by the Ministry of Infrastructure with regards to the Places to Grow "Towards Performance Measures" document released for discussion. We look forward to working with the government and related ministries to ensure our comments and recommendations are carefully considered and incorporated in a revised performance indicator document.

We respectfully submit that creating and monitoring the right set of performance indicators for the Greater Golden Horseshoe (GGH) Growth Plan is integral to achieving the plans' objectives, and also critical to the long term protection of the Greenbelt Plan objectives. It is essential to recognize the interconnectedness of both policy frameworks as the basis for forward-thinking land use planning in this region.

This framework should both: protect what is valuable on the landscape (natural heritage systems, productive agriculture, etc...), and manage responsible growth.

Key to success is an open and transparent process, where true inter-ministerial cooperation ensures robust, comprehensive and appropriate indicators are developed collaboratively. Further we believe there is a need for new indicators to be added to effectively track and monitor what is happening within the Growth Plan area specifically in relation to the state of natural resources, natural heritage systems and agricultural lands. We recognize that collecting quality data may be an issue. In order to address this, we feel it is important for the ministry to work with as many partners and other ministries as possible to fill in any data gaps and to assist the government in moving forward with meaningful indicators and data prior to the 2016 Review. Municipalities can be of assistance in providing data through various channels and we recommend that all avenues for data acquisition be pursued.

Accordingly, we request that the Province of Ontario:

**1) Connect Places to Grow Indicators back to the broader sustainability context**

The Places to Grow Act and corresponding indicators are grounded in and must be tied back to the broader sustainability context in Ontario. Pre 2006, land use planning challenges across the province threatened sensitive areas such as the Oak Ridges Moraine and prime agricultural lands in the GGH. Sustainably managing and directing growth was at issue. The result was two acts; The Greenbelt Act (2005) and The Places to Grow Act (2006). The intent was for the two to work in tandem to protect what is valuable to all Ontarians; balancing the need to protect the natural environment and agricultural land with the need for more sustainable urban growth and economic activity in the GGH. It is key that the ministry apply a lens to the indicators that speaks to the interconnectedness of these two acts and ensures that they measure success through a coordinated and consistent approach. The themes and their corresponding indicators must speak to protecting what is valuable both inside the Growth Plan area as well as inside the Greenbelt. The indicators must also connect with each other and enable comparison

**2) Ensure an open, transparent and collaborative process**

The Place to Grow draft indicators have been a long time in the making. They need to be carefully considered and crafted to ensure they capture the information necessary to adequately inform the Places to Grow review in 2016. In addition, they also need to be relevant for the longer term to help evaluate where the Act is working and where improvements are needed. Due to the interrelatedness of the Act, the Greenbelt Act, as well as other provincial policies, inter-ministerial coordination and meaningful collaboration between MOI, MMAH and other ministries to ensure that the indicators are developed collaboratively. They must reflect the full range of metrics required to provide a fulsome picture regarding how the Act is truly being implemented on the ground. Input from various ministries should be included and meaningfully incorporated.

3) **Revise and create a more defined Theme #4 “Protecting, conserving, enhancing and wisely using natural resources” & create/include more meaningful indicators**

**The Theme Area:** Theme 4 “Protecting, conserving, enhancing and wisely using natural resources” is the indicator that speaks to protecting what is valuable across the GGH landscape and is perhaps the only opportunity for analysis on the health of the environment in the Whitebelt. As such, the current theme heading is vague, ambiguous and unclear as to what is meant by natural resources. Do these resources include natural heritage systems and agricultural lands? Which other natural resources are being referred to? In short, there is a clear need to revise and distinguish natural resources such as aggregate resources, water resources etc... as well as natural heritage values and agricultural lands under this heading in order to measure what is happening to them accordingly under Places to Grow implementation.

**The Indicator:** Of even more pressing concern is the fact that all other theme areas have multiple indicators, whereas this theme area has only a sole indicator: measuring land consumption. This indicator is weak and does not capture other important metrics that should be evaluated under the Growth Plan policy Section 4.2 “Protecting what is valuable”. For example, this metric could conceivably show positive outcomes even if the Whitebelt was completely urbanized, as it only relates to the increase or decrease in density<sup>1</sup>, and does not speak to conservation goals or objectives. This is important as the Growth Plan covers 110 upper, lower and single tier municipalities, many of which have substantial natural heritage features and agricultural areas within their boundaries. Additionally under the Growth Plan’s policies Section 4.2.1 and 4.2.2 “Protecting what is valuable”, the vision for natural heritage mapping and prime agricultural land planning is referred to, however it is currently unclear if and how municipalities are implementing and completing this work. This section also includes resource development components which also require follow up and appropriate metrics to measure implementation.

**Need for Additional Indicators:** As such, we recommend additional indicators be added under a revised heading to effectively track and monitor what is happening within the Growth Plan, specifically in relation to the state of natural heritage systems and agricultural lands. Other ministries such as MMAH, MOE, MNR and OMAF/OMRA should be key players in this review and assist in developing a more robust and comprehensive set of indicators here. Other metrics could include the number of municipalities who have completed natural heritage systems mapping, implemented natural heritage system policies as well as agricultural land planning under the Growth Plan policies. Other metrics should also include for example evaluation of ecosystem health, protected land, enhanced conservation areas, an increase/decrease in the amount of natural cover in the Whitebelt broken out by category such as forest cover, wetland cover etc, similar to indicators that should be used for measuring success inside the Greenbelt ‘s Protected areas.

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<sup>1</sup> Percentage change of planned population and employment vs. percentage change of built area.

#### 4) Require Municipal Data Reporting for key metrics as part of the existing municipal reporting process

Collecting meaningful and consistent data is a challenge and one that will require creative thinking to deal with. Working with partners who have access to data and avoiding duplication of work will be important. Because municipalities implement both Places to Grow as well as the Greenbelt Act and plans are key partners in the collection of meaningful and consistent data. Because municipalities annually report detailed municipal information to the provincial government, it makes sense to include a number of indicators and required data sets as part of this process. This will better enable municipalities to report consistently across borders on the same baseline information that can then be used by the ministry in preparation for the 2016 review and beyond. Municipal Reporting is an already existing vehicle that should be used to help the government better understand municipal picture when it comes to places to grow implementation, and assist municipalities in providing relevant information that will fill in information gaps that may currently exist.

Again, thank you for this important opportunity. We would be happy to meet with you or your staff to discuss these submissions at your convenience.

Yours very truly,

Tim Gray



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